



UNITED STATES
NUCLEAR REGULATORY COMMISSION
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August 24, 1995

MEMORANDUM TO: John J. Linehan, Director
 Program Management, Policy Development
 and Analysis Staff
 Office of Nuclear Material Safety
 and Safeguards

FROM: John T. Greeves, Director *John Greeves*
 Division of Waste Management
 Office of Nuclear Material Safety
 and Safeguards

SUBJECT: DIVISION OF WASTE MANAGEMENT REVIEW OF CENTER FOR NUCLEAR
 WASTE REGULATORY ANALYSES FISCAL YEAR 1996 OPERATIONS PLAN

The Center for Nuclear Waste Regulatory Analyses (CNWRA) "Operations Plans for the Division of Waste Management FY 1996 (Revision 6, Change 0, August 1995)" have been reviewed by the Project Element Managers (PEMs) and Project Officers (POs) in the Division of Waste Management (DWM). In addition, on August 14, 1995, the CNWRA briefed the PEMs/POs on the Operations Plans and responded to questions. The comments generated as a result of the reviews and briefing have been approved by the PEM's/PO's respective branch chiefs and are being transmitted to you as a compilation of DWM comments.

One area of particular concern to the DWM staff is the relationship between Element 3.1, "CNWRA Operations" and Element 3.2, "Waste Systems Engineering and Integration." Because these two elements are so closely related, we are especially concerned with overlaps in implementing them. As a result of this concern, some of our comments are aimed at getting more detailed information from CNWRA so we can work to avoid duplicative efforts and unnecessary costs. To do this, we need to have a clear understanding of what work still needs to be finished, what is currently being done by CNWRA, and what work is planned.

Ken Kalman, of my staff compiled these comments and should be contacted if you have any questions about this compilation. The names of the actual reviewer are provided in parentheses next to the heading for each element or subtask.

3.1 CNWRA Operations Element

3.1.1.5 Subtask 5.4: CNWRA Internal QA Program (reviewed by J. Spraul)

During the August 14, 1995 briefing, PMDA directed CNWRA to make its internal audit reports as a deliverable item. We have no objection to this.

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3.1.1.6 Subtask 5.6: CDOCS System Support (reviewed by D. Chery)

This description does not make clear distinctions as to just what activities are covered by this task as "maintaining and operating" versus the development of the TDOCS & CDOCS (TDOCS with access to the OITS and RPD databases and report writer) under the WSE&I element. Further the description of activities does not clearly delineate what scanning/OCR/Clean-up (document loading) is covered by this subtask and what is done under other technical program tasks. In the August 14, 1995, presentation, CNWRA stated that \$81,600 is distributed among other technical elements for loading of technical documents. This distribution is not mentioned in the written section for this subtask.

After distributing \$81,600 to other elements for technical document loading, the CNWRA estimates spending for \$366,665 for loading "administrative" documents (QA documents and CNWRA Correspondence Index); loading a back-log of CNWRA reports (no estimate is given of the number of pages to be loaded); training custodians and users; and maintenance (however at this stage, maintenance is difficult to distinguish from development still being done under WSE&I). It would be desirable to have the CNWRA provide a breakdown of the costs for each of these activities under this subtask.

Also during the August 14, 1995 presentation, CNWRA noted that the "NRC Staff User Guide for TDOCS" gives a CNWRA phone number for HELP support on the use of the TDOCS application for both the NRC applications manager and NRC staff users. This CNWRA supplied support is not mentioned in this subtask and it was acknowledged (at the briefing) that it should be.

3.2 Waste Systems Engineering and Integration Element (reviewed by D. Chery and K. Kalman)

Subtask 5.2: CDOCS System Development

This subtask does not provide for the refinements and "fine tuning" developments of the TDOCS application which will carry over into FY96. A focus must be maintained in this subtask on; (1) completing the development of a the full-text and image search and retrieval application, (2) refining it after experience with the initial test implementation, (3) documenting the application properly for the NRC, and (4) then augmenting it for the high-level waste program by adding access to the RPD/OITS databases and generating special reports from the full text information in these two databases. The TDOCS application has yet to be installed on the NMSS Advanced Computer System but is now planned for installation during the week of August 21, 1995. The NRC will evaluate the system over the first 6 weeks after the initial 25 users are fully operational on the system and familiar with the TDOCS application (which we estimate will be about the first week in September). Thus, the NRC evaluation will not be given to the CNWRA until mid October (as comments on the draft Overall TDOCS application User's Guide). Then there will be a period of responding (refining the application) and revising the Overall TDOCS User's Guide which should include additional reference information as discussed in the review (May 16, 1995) of the CNWRA report on the TDOCS application design.

The development of the CDOCS application for the high-level waste program means adding to the set of document databases that can be accessed by the TDOCS application, the OITS database, and the RPD database, as well as using a report writing utility to produce a LARP from the RPD database and generating different open items reports for staff and DOE. One issue not mentioned in this subtask is the need and means for providing password access to these particular document databases (originally 5 levels of permission access was being planned for the OITS/RPD databases).

During discussions at the August 14, 1995, presentation of the Operations Plan, the CNWRA clarified that the RPD database would reside at both the NRC and at the CNWRA. His original understanding was that the full-text search and retrieval application would reside at both locations and the full text technical document database for high-level waste documents, [technical documents partition, NUREG partition, and regulations partition] would reside at and be updated [synchronized] between both locations. However, the RPD and OITS databases would be maintained and reside at the CNWRA and be accessed remotely. As directed by NRC in the April 13, 1995, letter to the CNWRA, the CNWRA should provide not only an "executable" program (application) but also the source program (code) for the application (TDOCS or CDOCS) and for any subsequent versions of the application.

Thus, the activities to be accomplished under this subtask need to include those for completing the basic TDOCS application and documenting it properly and then beginning the augmentation for CDOCS. There needs to be discussion with the CNWRA staff and the NRC TDOCS review group (D. Graser, E. Shelburne, R. Stuart, V. Drilea, C. Interrante, and S. Booher) for further articulation of just what activities need to be accomplished for the CDOCS augmentation.

During the August 14, 1995, briefing Aaron Dewispelare noted that the CNWRA expects to spend \$162,000 on this subtask versus the \$366,665, under the CNWRA Operations Element that the CNWRA expects to spend. Loading of the existing open items is essentially complete and it would be desirable for the CNWRA to provide a breakdown of the costs for each activity associated with this subtask so that a comparison of work in the two program areas can be made.

Subtask 5.3: CDOCS Maintenance and Operation for Regulatory Products

This subtask appears acceptable as described. However, during the August 14, 1995 briefing, CNWRA noted that it expects to spend \$158,000 on this subtask. We would like to see a cost breakdown. This was not provided with our copy of the Plan.

3.3 External Quality Assurance Element (reviewed by J. Spraul)

This task is acceptable.

3.4 Geology and Geophysics Element (reviewed by J. Trapp)

Although our discussions are continuing with the Office of Nuclear Regulatory Research (RES) regarding research activities directed towards calculating probabilities for volcanic events at and near Yucca Mountain, we believe that

CNWRA assistance is needed in the area of developing a conditional probability model to incorporate the effects of structural control on volcanism. It is our understanding that RES does not intend to incorporate this effort in its tasking of the CNWRA. The CNWRA should incorporate some aspects of the development of a conditional structural-volcanic probability model in its ongoing efforts on "Magmatic Modeling and Data Analysis" in Subtask 2.5.

3.5 Engineered Barrier System Element (reviewed by R. Weller)

No comment.

3.6 Repository Design, Construction and Operations Element (reviewed by M. Nataraja)

No comment.

3.7 Performance Assessment Element (reviewed by T. McCartin)

The Performance Assessment plan is acceptable. No change pages are required.

3.8 Geohydrology/Geochemistry Element (reviewed by D. Brooks)

The Geohydrology/Geochemistry plan is acceptable with the understanding that regulatory work in Subtask 1.2 that is directly related to Intermediate Milestone 812-605 (Support GWT Technical Position) should be deferred until notification is received from the PEM. However, the technical work needed to understand hydrologic processes (Intermediate Milestone 812-601) can proceed. Because the delivery date is September 1996 for the affected technical assistance, no change pages are required at this time.

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